

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

Health Republic Insurance Company,

Plaintiff, on behalf of
itself and all others
similarly situated,

vs.

United States of America.

Defendant.

Case No. 16-259C

Judge Kathryn C. Davis

PLAINTIFF’S UNOPPOSED MOTION FOR A STATUS CONFERENCE

Pursuant to Rule of the Court of Federal Claims 16(a), Plaintiff Health Republic Insurance Company (“Health Republic”) respectfully requests a status conference at the Court’s convenience. Health Republic wishes to raise two issues at this conference.

First, the parties have been in active discussions regarding entrance of stipulated judgments as to the Dispute Subclass (*i.e.*, a judgment for the Dispute Subclass against the United States, and a parallel judgment for the United States against Colorado Health Insurance Cooperative, Inc. on the United States’ counterclaim). Health Republic respectfully avers that discussion with the Court regarding proposed language in the judgment would be productive and could avoid yet further motion practice, as the dispute centers over a single sentence in the judgment against Colorado Health about where the United States may seek to collect on its counterclaim.

Second, on March 9, 2023, mandate issued from the United States Court of Appeals for the Federal Circuit with respect to an appeal from this Court (Dkt. 183). The Federal Circuit’s decision vacated and remanded this Court’s award of attorney’s fees and remanded the matter back to this Court for further proceedings. Plaintiff respectfully suggests that a status conference to address procedures and a schedule for further proceedings would be advisable at this time.

Dated: March 13, 2023

Respectfully submitted,

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

/s/ Adam B. Wolfson

Adam B. Wolfson
adamwolfson@quinnemanuel.com
865 S. Figueroa Street
Los Angeles, California 90017
Telephone: (213) 443-3000
Facsimile: (213) 443-3100

Andrew H. Schapiro
andrewschapiro@quinnemanuel.com
Margaret Haas
margarethaas@quinnemanuel.com
191 North Wacker Drive
Suite 2700
Chicago, Illinois 60606
Telephone: (312) 705-7400
Facsimile: (312) 705-7401

Attorneys for Colorado HealthOp and the Class